

**Prosecutor General's Office  
of the Russian Federation**

15A Bolshaya Dmitrovka  
Moscow, GSP-3, 125993, Russia

24.06.2005 Our ref. 35/2-1722-05

**Ms. Mary Ellen Warlow**  
**Director**  
Office of International Affairs  
U.S. Department of Justice

1301 New York Ave. NW  
Washington, D.C. 20005

**Dear Ms. Warlow,**

The Prosecutor General's Office of the Russian Federation presents its compliments to the U.S. Department of Justice and pursuant to the Treaty on Mutual Legal Assistance in Criminal Matters of 06/17/99 has the honour to request mutual legal assistance in criminal matter No. 897896 instituted on the elements of crime stipulated by Art. 159 part 3 (fraud performed in large amount) of the Criminal Code of the Russian Federation.

The performance of the investigative actions in the territory of the United States of America is necessary in order to ensure a comprehensive preliminary investigation.

The essence of the assistance required is set forth in the request of the investigator inquiring into the above case, attached hereto.

The Prosecutor General's Office of the Russian Federation guarantees that the documents and data obtained during the course of the request execution will be used for the purposes of the investigation only and will not cause any harm to the sovereignty, security and public order of the United States of America.

The Prosecutor General's Office of the Russian Federation thanks you in advance for your cooperation and confirms its readiness to provide or other kind of legal assistance in criminal matters to the law-enforcement agencies of the United States of America.

Enclosure: on 13 pages.

**Chief**

**International Law Department**



signature/

**R.A. Adelkhanyan**

**Attention:**  
**Authorities of the United States of America.**

**Re: International Investigation Requirement.**

**St. Petersburg.**

**April 15,2005.**

The Investigation Department, Crime Organized Division, Office #1, Headquarters-Police, St. Petersburg and Leningrad Region is in charge of the criminal case #897896, dated December 10,2004, according to the nature of crime, stipulated by Article 159, Part 3 Criminal Code of the Russian Federation, which is Fraud- the theft of property or taking the right to have property by a deceit and breach of confidence with a considerable financial loss/Please, find attached Article 159 CC of the Russian Federation.

During the preliminary investigation it was stated:

On December 2003, unknown persons, by fraud, committed a crime by taking the building, which belonged to Open Company "Trans-West", St. Petersburg, Piskarevskiy Pr. 119"A", granting false voluntary settlement, October 23,2003 between "Verta"LLC and "Trans-West"/the case #A-56-35714/03/ to the "City Office of Property Registration"/State Office of Justice/. The document was confirmed by Judge Anosova N.V., Arbitration Court of St. Petersburg and Leningrad Region. As a result on December 11,2003 "Verta"LLC got the right of ownership of this building, which cost not less than 853607 rubles. The Company had been damaged and it was a considerable financial loss for "Trans-West".

On December 16,2003 "Verta"LLC sold the building to "Benhurst Products "LLC ,incorporated and registered in the State of Delaver, USA, having its registered office at 5 Starboard Center , Building 20, Bettany -Beach,DE 19930, Sassex/hereafter "Benhurst Products"LLC/.

On February 03,2004 it was made a contract of sale between "Benhurst Products"LLC and "Mechmar"LLC ,registered on November 21,2003 in NY and having its office at 41 State Street, Suit 106, Albany, NY, 12207/hereafter "Mechmar"LLC, where "Mechmar"LLC became an owner of this building.

The Ukranien citizen Vakentina Petrovna Kirichenko, being as a representative of "Benhurst Products"LLC , made all the transactions by Attorney, which was certified by public notary Belva L.Nisbett, St. Christopher and Nevis, October 30,2003; Apostille #30931, dated November 04, 2003, legal consultant Theodor Hobson ,Ministry of Justice, Charlestown, Nevis. The Manager Anna Andreou acted on behalf of "Mechmar"LLC. In the contract there was an official office to address to the Company-"Kolby Attorneys Co.Inc.", 41 State Street, Office 106, Albany, NY, 12207. During the preliminary investigation and questioning of witnesses we have the information about possible complicity of people, suspected in this crime, who formed

the mentioned companies in the United States of America for criminal activities. Besides that it's necessiti to confirm a Power of Attorney under the name of Kirichenko V.P.

For the purpose of establishment of the truth we need to get legal assistance from the Authority of the United States of America.

According to the Treaty between the Russian Federation and the United States of America "About Mutual Assistance , concerning criminal matters, dated June 17,1999"

**I formally ask you:**

1.To confirm the registration of the companies in USA and their commercial activities."Mechmar"LLC-registration in November 21,2003,NY,41 State Street. office 106,Albany,NY 12207. "Benhurst Products"LLC-registered office at 5 Starboard Center, Building 20, Bettany-Beach, DE 19930, Sassex.

2.I also ask you to question as witnesses founders and managers of these companies.

**Re: "Benhurst Products"LLC**

-What activity does the Company has?

-Did "Benhurst Products"LLC make a contract of sale with "Verta"LLC, concerning the unit of uninhabitable fund, located at the address: St. Petersburg, Piskarevskiy Pr. 119"A".

-How did they know about alienation of building from the property of "Verta"LLC?

-For what purpose did "Benhurst Products"LLC buy the building?

-Who was negotiator on behalf of "Benhurst Products"LLC and "Verta"LLC, concerning this transaction and how did they do that /personally, by phone, etc/?

-Did the Company grant Ukranien citizen Kirichenko a Power of Attorney to represent "Benhurst Products"LLC interests?

-How much does the building cost and what was the payment?

-Are they aware of "Mechmar"LLC and its personal staff?

-For what reason was this building alienated by "Benhurst Products"LLC in favour of "Mechmar"LLC? What was the payment/ sum of money and terms/?

-Where was the contract of sale signed? Who signed this contract on behalf of "Mechmar"LLC? Who was negotiator?

-Does the Company know such people as Gradoboev Alexander Georgievich, Bolshakov Maxim Valerievich, Alyashevich Pavel Arkadievich, Zimbal Sergey Vladimirovich and Chirkin Sergey Victorovich? If it does, what relationship do they have now.

**Re: "Mechmar"LLC**

-What is the business activity ?

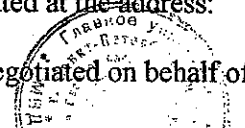
-Is Anna Andreou the Manager of Company/"Mechmar"LLC?

-Are they aware of company "Benhurst Products"LLC and its personal staff?

-What relations do they have with this company

-Did they make a contract of sale ,February 03,2004 between their own company and "Mechmar"LLC, concerning the unit of uninhabitable fund, located at the address: Russian Federation, St. Petersburg, Piskarevskiy Pr. 119"A"/

-For what purpose did "Mechmar"LLC buy the building, who negotiated on behalf of these companies?



- Was Anna Andreou in St. Petersburg , Russian Federation in February 03,2004?
- Did she sign the above mentioned contract of sale?
- Does she know such people as Gradoboev Alexander Georgievich, Alyashevich Pavel Arkadievich, Zimbal Sergey Vladimirovich, Chirkin Sergey Victorovich? When did they meet and what relations do they have now?
- Did the Company grant Gradoboev A.G. a Power of Attorney to represent "Mechmar"LLC interests? Who certified it?
- How do they use the building now and where is the profit transfered?
- Has "Mechmar"LLC business relations with "Gris"LLC, Russian Federation?

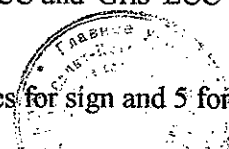
3.The information about the person-Anna Andreou-the Manager of "Mechmar"LLC, the official representative of the company "Kolby Attorneys Co.Inc.", 41 State Street, Office 106, Albany,NY, 12207.

There is no more information.

To set up Anna Andreou's location and question her as a witness:

- Was she in St. Petersburg in February 03,2004? If she was, when ,what way and for what purpose did she arrive in St. Petersburg?
- Did "Mechmar"LLC purchase the building in St. Petersburg, Piskarevskiy Pr.119 "A"? If they did, when,where and for what reason was this building acquired?
- Who was on behalf of seller?
- How did she/Anna Andreou/ establish relations with sellers of this building?
- How much money did she pay to "Seller"?
- What is the business activity of "Mechmar"LLC?
- What does she know about business activity of "Benhurst Products"LLC?
- Who is the Manager and other personal staff/ names, addresses, contact telephones/.
- What commercial activity is the company "Benhurst Products"LLC in charge of?
- Did she know Kirichenko Valentina Petrovna?
- Who negotiated with seller to buy this building?
- Who made a decision to make contract of sale?
- Who was the representative of "Benhurst Products"LLC in this transaction? Who negotiated and who signed the contract of sale?
- Where/the place/ and when/the time/was the contract of sale between "Benhurst Products "LLC and "Mechmar"LCC made?
- Does she know such people as Gradoboev Alexander Georgievich, Alyashevich Pavel Arkadievich, Bolshakov Maxim Valerievich? If she does, how does she meet them and what relationship do they have now?
- Did she grant Gradoboev A.G. a Power of Attorney to represent "Mechmar "LLC interests? If she did, who certified it?
- How does the Company use the building now and where is the profit transfered?
- Do these Companies have mutual business relations/"Mechmar"LCC and"Gris"LCC the Russian Federation/?

4.To get samples of Anna Andreou's hand writing and sign- 5 pages for sign and 5 for hand writing, also ID with her picture.



5.To get the information about bank accounts of "Mechmar" LCC and "Benhurst Products" LCC and receipts from December 16,2003 until now? To get the copies of payment documents to confirm it according to the sale contracts of this building.

6.To question as a witness public notary Belva L.Nisbett, St. Christopher and Nevis, legal consultant Theodor Hobson, Ministry of Justice, Nevis and confirm in the statement whether they certified the Power of Attorney, October 30,2003 or not. Apostille #30931, November 04,2003. Under what name was this Power of Attorney?

7.From the notary Archives to get the copy of record, concerning a Power of Attorney and certified it by official seal.

8.To get all the complete information concerning the Banks, which clients are "Mechmar" LLC and "Benhurst Products" LLC.

All the information in the document is confidential. We guarantee that all the information we receive will be used for the investigation only and for no other purpose.

**All the information should be sent to the following address:  
The Investigation Committee of the Internal Affairs of Russia  
Building 6  
Gazetny Pereulok  
103009 Moscow.**

Each document must be authorized with the seal of Justice. If any information cannot be sent, please, inform the Russian Authority.

We are appreciate your cooperation and are ready to provide the same legal assistance you need it.

**Appendix: the extract of Article 159 and 171 Criminal Code of the Russian Federation-2 pages.**

**Senior Investigator  
Investigation Department  
Crime Organized Division  
Office 1  
Headquarters-Police  
St. Petersburg and Leningrad Region  
Captain of Justice**



**Chernishova O.V.**

**Contact details:  
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